

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**JILL DILLARD, JESSA SEEWALD,
JINGER VUOLO, and JOY DUGGAR**

PLAINTIFFS

vs.

CASE NO. 5:17-5089-TLB

**CITY OF SPRINGDALE, ARKANSAS;
WASHINGTON COUNTY, ARKANSAS;
KATHY O'KELLEY, in her individual and
official capacities;
ERNEST CASE, in his individual and official capacities;
RICK HOYT, in his individual and official capacities;
STEVE ZEGA, in his official capacity;
BAUER PUBLISHING COMPANY, L.P.;
BAUER MAGAZINE, L.P.;
BAUER MEDIA GROUP, INC.;
BAUER, INC.;
HEINRICH BAUER NORTH AMERICA, INC.;
BAUER MEDIA GROUP USA, LLC; and
DOES 1-10, inclusive**

DEFENDANTS

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY BRIEF
SUBMITTED ON BEHALF OF
SEPARATE DEFENDANTS CITY OF SPRINGDALE, ERNEST CATE, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITIES, AND KATHY O'KELLEY IN HER
INDIVIDUAL AND OFFICIAL CAPACITIES,**

COMES NOW the Separate Defendants, City of Springdale, Ernest Cate ("Cate"), in his individual and official capacities, and Kathy O'Kelley ("O'Kelley"), in her individual and official capacities (collectively referred to herein as the "Springdale Defendants"), by and through the undersigned attorneys, and for their Unopposed Motion for Leave to File Reply Brief, state as follows:

1. Springdale Defendants filed their Motion to Dismiss (Docket No. 21) and supporting brief (Docket No. 22) on June 19, 2017.

2. The Plaintiffs filed a response in opposition to Springdale Defendants on July 13, 2017 (Doc. No. 32).

3. Because of the importance of the issues at hand, Springdale Defendants would like to reply to Plaintiffs' response and therefore requests leave to file the reply brief, which is submitted contemporaneously with this motion as Exhibit A.

4. Counsel for Springdale Defendants conferred with Counsel for the Plaintiffs, and has been advised that Plaintiffs have no objection to this request.

WHEREFORE, Springdale Defendants respectfully requests that the Court grant them leave to file the reply brief submitted contemporaneously with this motion as Exhibit A.

Respectfully Submitted,

/s/ R. Justin Eichmann

R. Justin Eichmann (Ark. Bar No. 2003145)

E-mail: jeichmann@arkansaslaw.com

Thomas N. Kieklak (Ark. Bar No. 92262)

Email: tkieklak@arkansaslaw.com

HARRINGTON, MILLER, KIEKLAK,
EICHMANN & BROWN, P.A.

4710 S. Thompson, Suite 102

Springdale, AR 72764

Phone: (479) 751-6464

Fax: (479) 751-3715

and

Susan Keller Kendall (Ark. Bar No. 98119)

KENDALL LAW FIRM, PLLC

3706 Pinnacle Hills Parkway, Suite 201

Rogers, Arkansas 72758

Email: skk@kendalllawfirm.com

Phone: (479) 464-9828

Fax: (479) 464-9768

**COUNSEL FOR SPRINGDALE
DEFENDANTS**

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on 24th day of July, 2017, a true and correct copy of the above and foregoing was filed with the Clerk via the CM/ECF system which will send notification of filing to the following:

Lauren S. Wulfe Robert C. O'Brien Steven E. Bledsoe LARSON O'BRIEN, LLP 555 S. Flower Street Suite 4400 Los Angeles, CA 90071 (213) 436-4888 lwulfe@larsonobrienlaw.com robrien@larsonobrienlaw.com sbledsoe@larsonobrienlaw.com	Shawn B. Daniels Sara C. Jewell HARE, WYNN, NEWELL & NEWTON, LLP 129 W. Sunbridge Drive Fayetteville, AR 72703 479-521-7000 Fax: 479-437-2007 shawm@hwnn.com sjewell@hwnn.com
Cynthia W. Kolb CROSS, GUNTER, WITHERSPOON & GALCHUS, P.C. 500 President Clinton Avenue Suite 200 Little Rock, AR 72201 (501) 371-9999 Fax: (501) 371-0035 ckolb@cwgwg.com	Elizabeth Anne McNamara Jamie Somoza Raghu Davis Wright Tremaine LLP 1251 Avenue of the Americas, 21st Floor New York, NY 10020 lizmcnamara@dwt.com jamieraghu@dwt.com
Jason E. Owens Rainwater, Holt & Sexton, P.A. P.O. Box 17250 Little Rock, AR 72222-7250 owens@rainfirm.com	

/s/ R. Justin Eichmann

R. Justin Eichmann
Arkansas Bar No. 2003145
HARRINGTON, MILLER, KIEKLAK,
EICHMANN AND BROWN, P.A.
Attorney for Springdale Defendants
4710 S. Thompson, Suite 102
Springdale, AR 72764
(479)751-6464